

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

In RE:

Jose Pittol

Debtor.

Case No.: 18-40038 edk

Chapter: 11

COUNSEL TO THE DEBTOR'S MOTION TO APPEAR TELEPHONICLY

**NOW COMES**, Robert W. Kovacs, Jr., counsel to the Debtor, Jose Pittol, and requests to appear telephonically at the hearings now set for July 20, 2018 at 11:30 AM. In support thereof, counsel states as follows:

(1) The Court has rescheduled hearings originally set for July 17, 2018 to July 20, 2018 at 11:30 AM.

(2) The matters to heard on July 20, 2018 are:

[55] Motion filed by Debtor Jose M. Pittol for Use of Cash Collateral

[56] Motion filed by Creditor U.S. Bank National Association for Relief from Stay

[81] Amended Re: [56] Motion for Relief From Stay filed by Creditor U.S. Bank National Association

(3) Counsel for the Debtor has §341 meetings and a Court hearing at the Juvenile Court in Dudley, throughout the entire day on July 20, 2018.

(4) The Juvenile Court hearing in Dudley will not be able to be rescheduled.

(5) Counsel for the Debtor will be available to appear at the hearings in this matter telephonically.

(6) If in the Court's discretion the Court prefers to reschedule the hearing, counsel notes that he can be available anytime the week starting July 23, 2018 but will be out of the office from July 30, 2018 until August 10, 2018.

**WHEREFORE**, Counsel requests that this Honorable Court:

- a.** Allow counsel to appear telephonically at the above referenced hearing;
- b.** Alternatively rescheduled the hearings and continue the use of cash collateral through the date of the rescheduled hearing; and
- c.** Order any other relief that is fair and equitable.

Dated: July 14, 2018

Respectfully Submitted by,

/s/ Robert W. Kovacs, Jr.  
Robert W. Kovacs, Jr.  
Bar No.: 671497  
Kovacs Law, P.C.  
131 Lincoln Street  
Worcester, MA 01605  
Telephone No.: (508) 926-8833  
E-mail: [Robert@KovacsLawFirm.com](mailto:Robert@KovacsLawFirm.com)

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

In RE:

Jose M. Pittol

Debtor.

Case No.: 18-40038-EDK

Chapter: 11

Certificate of Service

I hereby certify that, upon information and belief, the above was electronically served via the CM/ECF System of the United States Bankruptcy Court for the District of Massachusetts upon the following CM/ECF Participates:

- United States Trustee
- Jason Giguere for U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-Through Certificates, Series 2006-WMC1
- Richard T. Mulligan for U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-Through Certificates, Series 2006-WMC1
- Joshua Ryan-Polczinski for U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-Through Certificates, Series 2006-WMC1
- Jason Giguere for U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-Through Certificates, Series 2006-WMC1

**Manuel Notice List**

I further certify that I, on July 14, 2018 have served a copy of the same by first class mail, postage prepaid, on the non CM/ECF participates below.

Jose Pittol  
33 Hastinig Street  
Marlboro, MA 01752

Dated: July 14, 2018

Respectfully Submitted by,

/s/ Robert W. Kovacs, Jr.  
Robert W. Kovacs, Jr.